

Jared B. Foley (JF-1982)
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Attorneys for Defendants
Gallet Dreyer & Berkey, LLP

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LUIS FELIPE MORENO-GODOY,

Plaintiff,

14-CV-07082 (PAE)

-against-

NOTICE OF MOTION

GALLET DREYER & BERKEY, LLP, ROGER L.
STAVIS, ESQ., and STEVEN R. KARTAGENER, ESQ.

Defendants.

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PLEASE TAKE NOTICE that, upon the Declaration of Jared B. Foley, and the annexed memorandum of law, defendant Gallet Dreyer & Berkey, LLP will move this Court *in limine*, before the Honorable Paul A. Engelmayer, at the United States Courthouse located at 40 Foley Square, New York, New York 10007, on a date to be determined by this Court, for an Order:

1. Precluding plaintiff LUIS FELIPE MORENO-GODOY, and non-party witnesses MONZER AL-KASSAR, RAGHDAA HABBAL, and JUAN MANUEL RODRIGUEZ-OCAÑA from testifying regarding the source of the funds provided to defendant Steven R. Kartagener, Esq.; and

2. Granting to defendant GALLET DREYER & BERKEY, LLP such other and further relief as this Court deems just and proper.

Dated: New York, New York
February 22, 2022

GALLET DREYER & BERKEY, LLP

/s/ Jared B. Foley
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